COMMANDER, NAVY REGION SOUTHWEST

REGIONAL MPPEH PLAN

8 NOVEMBER 2005

Subj: REGIONAL MATERIAL POTENTIALLY PRESENTING AN EXPLOSIVE HAZARD (MPPEH) PLAN

Ref: (a) NOSSAINST 8023.11A (series)
(b) NAVSEA OP-5 Vol 1, 7th Rev, Ch 4, Ammunition and Explosives Safety Regulations for Handling, Storing, Production, Renovation and Shipping
(c) COMNAVREGSWINST 8020.2B (series)
(d) CNRSW Explosive Hazardous Waste Management Plan, 9 Apr 04

1. Purpose. To establish policy, procedures, responsibilities, and guidelines for use by Commander, Navy Region Southwest (CNRSW) departments, tenants, and contractors for the management, handling, accumulation, and turn-in of MPPEH as required by references (a) - (d).

2. Cancellation. This is a new plan; therefore there are no plans or instructions to cancel.

3. Background.

a. Explosives mishaps involving munitions residue over the past several years prompted the Department of Defense (DOD) and Navy Ordnance Safety and Security Activity (NOSSA) to improve and clarify the regulations involved with the inspection, certification, and disposal of munitions residue. As one of the improvements, NOSSA consolidated Federal, DOD, and Navy policy and incorporated them into Section 13-15 of reference (b), in 2005. The requirements in reference (b) are reflected in this Regional MPPEH Plan.

b. One significant change in reference (b) is the addition of the term MPPEH and the consolidation of MPPEH requirements directly and by reference. MPPEH is material that is NOT known with certainty to present an explosion hazard, but may contain hidden explosive material, or minor amounts of explosive material. MPPEH must be assumed to present an explosion hazard until it is visually inspected and/or processed, and certified "safe". Live ordnance that has functioned as designed and unexploded ordnance detonated during clearance or cleanup operations result in a variety of MPPEH. These items require inspection, certification, and disposition. MPPEH examples include expended base-ejecting artillery projectiles, cluster munition dispensers, flare and signal casings, smoke grenades, jet assisted takeoff (JATO) motors, rocket tubes, rocket assisted takeoff (RATO) motors, practice munitions, small arms cartridge cases, kinetic penetrators, and shrapnel. Note that MPPEH can also be generated off-range, e.g. munitions and components formerly used for testing and no longer needed,

unexpended items identified as waste or will be waste per a Notice of Ammunition Reclassification (NAR), and munitions containers and packaging material.

c. While the term MPPEH is somewhat new, the regulations associated with MPPEH are not new. In the recent past, deficiencies within CNRSW to implement these existing regulations have resulted in Explosive Safety Inspection (ESI) violations. Therefore, this Plan is meant to address these deficiencies. The deficiencies will be fully corrected when Installation MPPEH Plans (listing all MPPEH types generated on base) and Standard Operating Procedures (SOPs) describing MPPEH processing are developed and implemented as required by this Plan.

4. Scope. This Plan is applicable to all CNRSW departments, tenants, and contractors who generate, handle, transport, or manage MPPEH, or who have the potential to deal with MPPEH in such a manner.

5. Policy. It is CNRSW policy per references (a) - (d) to manage and process MPPEH in support of operational readiness and mission requirements in a way that complies with explosive safety and environmental requirements through final disposition. This Plan establishes criteria for managing and processing MPPEH. These criteria are intended to protect personnel and property from unintentional exposure to potential explosive hazards associated with material being transferred within or released from DOD control.

6. Action and Responsibilities.

a. While each Installation Commanding Officer has full responsibility for MPPEH generated at their activity, all CNRSW Programs (Ranges, Weapons, Force Protection, EOD, Explosives Safety, Environmental, etc.), tenants, and contractors who deal with MPPEH share the responsibility for compliance with this Plan and references (a) - (d) in a manner that supports operational readiness and mission requirements. The effective management of MPPEH shall prevent: (1) unauthorized use, transfer, or release of MPPEH from Navy control; (2) a transfer or release of MPPEH that will unintentionally present an explosive hazard to either a qualified receiver or the public; and (3) shipment of MPPEH that violates hazardous material transportation regulations.

b. Each CNRSW Installation shall develop a formal, signed Plan identifying all MPPEH types generated on base. Each Installation MPPEH Plan shall reiterate the requirement to develop and implement SOPs to specifically describe the MPPEH

processes and responsibilities from generation to final disposition with special emphasis on storage, handling, and certification.

c. Full implementation of this Regional MPPEH Plan is required within 180 days of its issuance. Note that no MPPEH activity may be undertaken at any time without an approved SOP that is compliant with this Plan and references (a) - (d).

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REGIONAL MPPEH PLAN

Table of Contents

1. Definitions.

a. **Certification of MPPEH.** Signed documentation by authorized personnel that declares the explosives safety status of MPPEH.

b. Demilitarization. The act of destroying the military offensive or defensive advantages inherent in certain types of equipment or material. The term includes mutilation, dumping at sea, cutting, crushing, scrapping, melting, burning or alteration to prevent the further use of this equipment and material for its originally intended military or lethal purpose and applies equally to material in unserviceable or serviceable condition, that has been screened through the Inventory Control Point (ICP) and declared surplus or foreign excess.

c. Explosive Safety Status of MPPEH. "Safe" means certified as not presenting an explosion hazard, and consequently safe for unrestricted transfer or release pending any further demilitarization requirements or trade security controls (Safe is also known as 5X). Material that has been certified Safe is no longer considered MPPEH provided the chain of custody remains intact. "Hazardous" means certified as known or suspected to present an explosion hazard.

d. Material Potentially Presenting an Explosive Hazard **(MPPEH).** Material potentially containing explosives or munitions (e.g. munitions containers and packaging material; munitions debris remaining after munitions use, demilitarization, or disposal; and range-related debris); or material potentially containing a high enough concentration of explosives such that the material presents an explosive hazard (e.g. equipment, drainage systems, holding tanks, piping, or ventilation ducts that were associated with munitions production, demilitarization or disposal operations). Excluded from MPPEH are military munitions within the Department of Defense's established munitions management system and other hazardous items that may present explosion hazards (e.g. gasoline cans, compressed gas cylinders) that are not munitions and are not intended for use as munitions.

e. **Operational Range.** A range that is under the jurisdiction, custody, or control of the Secretary of Defense and is used for range activities; or although not currently being used for range activities, that is still considered by the Secretary to be a range and has not been put to a new use that is incompatible with range activities. The term "range", when used in the geographical sense, means a designated land or water area that is set aside, managed and used for range activities of

the Department of Defense. The term includes: firing lines and positions, maneuver areas, firing lanes, test pads, detonation pads, impact areas, electronic scoring sites, buffer zones with restricted access, and exclusionary areas; and airspace areas designated for military use in accordance with regulations and procedures proscribed by the Administrator of the Federal Aviation Administration.

f. **Process.** A series of operations on ammunition and explosives related to: manufacture; loading, assembly, and packing (LAP); maintenance, reconditioning, renovation, rework, and repair; modification and conversion; receipt, storage, segregation, and issue (RSS&I); handling, shipping, loading, and unloading; research, development, test, and evaluation (RDT&E) of ordnance end items or explosive components; demilitarization; disposal, munitions response, and MPPEH processing.

g. Qualified Receiver of MPPEH. Activities that have personnel or individuals who are, trained and qualified in the identification and safe handling of used and unused military munitions, and any known or potential explosive hazards that may be associated with the MPPEH they receive; and are licensed and permitted or otherwise qualified to receive, manage, and process MPPEH.

h. Qualified Recycling Program (QRP). Organized operations that require concerted efforts to divert or recover scrap or waste, as well as efforts to identify, segregate, and maintain the integrity of the recyclable materials in order to maintain or enhance their marketability. If the program is administered by a DOD component, a QRP includes adherence to a control process providing accountability for all materials processed through program operations.

i. **Small Arms Ammunition.** Ammunition, without projectiles that contain explosives (other than tracers), that is .50 caliber or smaller, or for shotguns.

2. MPPEH Terms and Categories.

a. MPPEH may be referred to as, generated from, or included in the following: ammunition, explosives, and dangerous articles (AEDA); AEDA residue, range residue; range, demil, or metal scrap; munitions debris, range-related debris, explosive contaminated property; explosive contaminated scrap; tooling, hardware, equipment and building debris from facilities used in munitions processing; munitions and explosives of concern (MEC); and 3X material.

b. MPPEH explosives contamination falls into one of four categories: 5X, 3X, 1X and 0X. This terminology is to be used in correspondence and documentation to indicate degree of explosion hazard. These terms are sometimes loosely applied to real property as well. Processes and procedures to attain these levels are determined locally. The MPPEH categories are defined below.

c. **Category 5X.** The item is completely decontaminated and entirely safe and may be released for general use provided that:

(1) All demilitarization requirements for the item are met, or release of the material is contingent upon demilitarization;

(2) Items are only classified as 5X through visual inspection when every surface is visible and capable of being inspected. Visual inspection is only applicable to pieces of metal that have no cavities, holes, blind spaces, rivets, cracks, or other obscured features;

(3) Probes are NOT used to inspect any blind cavities. Probes may NOT be used to satisfy visual inspection requirements for purposes of documentation as having an explosives safety status of safe;

(4) Variations from these general practices by other than qualified active duty Explosives Ordnance Disposal (EOD) personnel require approved SOPs; and

(5) The material is fully documented (certified) as having an explosives safety status of safe. Note: Thermal or chemical processing is the most effective way to ensure that material is 5X as long as it does not trigger additional environmental treatment permitting requirements.

d. **Category 3X.** The item has been examined and no contamination can be visually noted on accessible surfaces or in concealed housings. 3X material is MPPEH. It is not safe to be treated with open flame, high temperature heating devices, cutting devices, or hammering devices. The following requirements apply to 3X materials:

(1) 3X material is expected to be free of explosion hazard, but not enough information is available to certify it as safe. This may be because there are potential internal cavities or devices that contain explosives, or because the material is not 100% inspected, or because the certification process has not been completed to the point of documentation with dual signatures.

(2) When there is the slightest doubt concerning the presence of any explosive material, the material shall be subjected to whatever process is necessary to ensure it has an explosives safety status of safe before it is released from DOD control.

(3) 3X material may be treated with flame, hand held torches, and approved devices only with written approval for hot work from the designated explosives safety officer and with approved SOPs.

e. **Category 1X.** The item is contaminated or partially decontaminated and is likely to present an explosion hazard. 1X material is MPPEH. 1X material differs from 3X in that 1X is believed LIKELY to present an explosion hazard, while 3X material is NOT expected to present an explosion hazard.

f. **Category 0X.** Items, equipment or buildings that were never contaminated and do not pose an explosion hazard. 0X material is not MPPEH. It is safe to conduct welding, drilling, and sawing on these materials and release them to the general public.

g. **Control of 1X and 3X Material.** 1X and 3X material must be certified as having an explosives safety status of "hazardous" before transfer from one organizational entity to another, between activities, or released from government control. 1X and 3X material must be documented as to the explosion hazards the material is known or suspected to present, and tagged in accordance with reference (b) before transfer from one area of the activity to another and stored or placed in a standby status.

3. MPPEH Facilities.

MPPEH processing is considered an operation involving ammunition and explosives handling, until the material is certified as safe. MPPEH storage is considered ammunition and explosives storage. Locations used to store and process MPPEH must have site approval in accordance with reference (b). Locations used for processing MPPEH shall be sited as:

a. An exposed site (ES), at not less than intraline distance from surrounding potential explosive sites (PES); or

b. A PES when the MPPEH has not been certified, or has been certified "hazardous".

Site approval is not required for storage of collected MPPEH on an operational range. However, the explosive safety quantity-

distance arc must remain within the range impact area and associated buffer zone. The hazard classification and net explosive weight (NEW) of MPPEH shall be based on characteristics of the type of MPPEH involved, its packaging (if any), and the estimated amount of explosives potentially present. Areas where MPPEH is processed or stored must be designated as restricted areas and posted in accordance with reference (b) until the MPPEH is certified safe.

4. MPPEH Storage.

To maintain the chain of custody, do not commingle the following categories of material. (Should commingling occur, the MPPEH certified as safe shall lose its safe certification.)

a. MPPEH awaiting documentation of its explosive safety status;

b. Material that has been certified safe; and

c. Material that has been certified hazardous.

To prevent commingling, use a suitable combination of controls such as separate storage locations within the storage site, moveable signs and ribbon barriers, locked gates, locked containers, waterproof certification documents attached to containers, container seals traceable to the transfer documentation, or other locally determined methods included in approved SOPs. Once certified safe, MPPEH must be segregated in a location with controlled access, preferably a locked facility. Minimize the quantity and time MPPEH is accumulated and retained at any location. When possible, MPPEH shall be covered or stored in closed containers to prevent exposure to or the collection of precipitation. Expended small arms cartridge cases not certified as safe are subject to the reduced storage and siting requirements of reference (b), paragraph 7-5.5.

5. MPPEH Processing.

a. MPPEH processing includes any action or operation involving MPPEH, including but not limited to: collecting, consolidating, sorting, segregating, separating by metal type, inspecting, storing, decontaminating, transferring, certifying, releasing, demilitarizing (shredding, shearing, chopping, crushing, flattening, cutting, melting), and transporting material. All MPPEH processing must have an approved SOP in accordance with reference (a).

b. Documentation is key to safe MPPEH management. Documentation allows certification, chain of custody, and explosives safety status to be tracked and known at all times.

The chain of custody must be maintained for MPPEH certification using documentation to include approved SOPs, labels, and transfer documents, e.g. DD-1348-1. If chain of custody cannot be verified, then the affected MPPEH must undergo a second 100% inspection, a second re-inspection and be documented to verify its explosives safety status.

c. For MPPEH that is derived from munitions debris and range-related debris, activities should give first consideration to the practicability of providing a closed-circuit process managed by a single entity that maintains a chain of custody and accountability from collection through final disposition, e.g. from debris to metal ingot, before considering other alternatives.

d. MPPEH may be certified safe and released for further demilitarization, e.g. mutilating, crushing, smelting, only if the integrity of the containers and the chain-of-custody is maintained, and the documentation accompanies the material through final disposition.

e. Refer to DOD 4160.21-M-1 (series) and related Defense Logistics Agency (DLA) guidance for the minimum demilitarization requirements for MPPEH in addition to the requirements for certification of having an explosive safety status of safe as described herein.

f. Contracts and other legal agreements dealing with MPPEH require compliance with the provisions of: this MPPEH Plan; references (a) - (d); DOD 4140.62 (series) Management and Disposition of MPPEH; DOD 4145.26-M (series) DOD Contractor's Safety Manual for Ammunition and Explosives; and DOD 4160.21-M-1 (series) Defense Demilitarization Manual.

g. Scrap metal is often collected over time, sold, and resold. Once certified safe MPPEH enters the recycling stream, the mere appearance of being a live munition my result in confusion and callbacks to military EOD personnel to remove a perceived explosion hazard. Therefore, demilitarization should, to the greatest extent possible, process certified MPPEH until it no longer looks like ordnance. This means to process it until a reasonable person will not mistake it for a hazardous item. Personnel must strive to remove the "military look-alike".

h. Vent or expose any MPPEH internal cavities, including training or practice munitions, to:

(1) Confirm that an explosive filler is not present; and

(2) Prevent the buildup of pressure if the certified safe MPPEH is later heated.

Procedures used to achieve venting include use of shaped charges, crushers, drills, saws, etc. Attended, production, and/or sited venting procedures shall be developed with an engineering design, based on a mishap risk assessment (MRA) in accordance with reference (b), paragraph 7-7.3.

i. Expended small arms ammunition cartridge cases may be processed as a non-explosive operation prior to safe certification, provided they are screened before processing. Screening is intended to ensure that only .50 caliber and smaller are processed, and to remove unused cartridges. Screening will be done by locally determined methods included in approved SOPs.

6. MPPEH Certification Methods and Requirements.

Personnel who are qualified and authorized to sign a certification of MPPEH as safe or hazardous, will be designated in writing by the commanding officer. The designation letter will include sample signatures. A current list of personnel along with their sample signatures, who are qualified and authorized to certify MPPEH as safe, shall be provided to any Defense Reutilization Marketing Office (DRMO) or QRP receiving MPPEH.

a. Certification as safe by visual inspection requires a 100% inspection by one individual, followed by an independent 100% re-inspection by another.

b. The following certification signature combinations may be used when visual inspections are employed.

(1) Initial inspector and second inspector perform 100% inspection, and both sign the certification document.

(2) Initial inspector does not sign the certificate but conveys the results of their 100% inspection to a second inspector with direct knowledge of their work; second inspector performs 100% inspection, signs the certificate, and provides it to a final certifying official who inspects the material on a sampling basis and provides the second signature.

(3) The individual(s) providing the 100% inspections must convey the results of their inspections to the final certifying official (second mandatory signature) in a way that ensures the veracity of the chain-of-custody for the material.

c. Chain-of-Custody. This term refers to the activities and procedures taken throughout the inspection, re-inspection and documentation process to maintain positive control of MPPEH to ensure the veracity of the process used to determine the status of material as to its explosive hazard. This includes all such activities from the time of collection through final disposition. Methods to ensure chain of custody veracity include, but are not limited to, locally developed procedures that are documented in SOPs such as a standardized container numbering system with unique identifiers, permanent, weatherproof container markings or labels; locked or sealed and secured containers, and checklists.

d. Certification as safe by technical methods other than 100% visual inspection requires a post-processing sampling inspection with one signature by an authorized person. Technical methods to process MPPEH for safe certification include thermal processing, e.g. hot fire flashing, hot gas decontamination, and chemical treatments approved by NOSSA. Quality control and quality assurance methods include thermocouples, explosive-treated coupons, infrared thermometers, swab samples, and colorimetric methods. The post-processing sampling inspection may range from an approved written plan for one item, to a robust quality control and quality assurance program, depending on the scope and hazards of the effort.

e. Certification as hazardous by 100% visual inspection. When an initial inspection by a qualified and authorized person determines that the material is hazardous, a second independent inspection is not required, and the certification may be prepared by the inspector or by another qualified and authorized individual.

f. Visual inspections are often augmented by probes, sensors, color reagents, or other aids, and are effective only if the person performing the inspection is properly qualified and certified for the specific type of MPPEH being examined and the aids employed.

7. MPPEH Certification Documentation.

a. Certification as safe will be provided using DD Form 1348-1, or local form as authorized by the commanding officer. The two signatures required for the safe certification must be directly above the typed, clearly stamped, or legibly printed full name, rank/rate/grade, complete organization name and address, and phone numbers (commercial and DSN). Safe certifications shall include the following statement:

"This certifies that the material potentially presenting an explosive hazard listed has been 100% properly inspected and to the best of our knowledge and belief, is inert and/or free of explosives or related materials."

Material intended for disposition by DRMO may use the alternate statement provided in reference (b), paragraph 13-15.10. This information shall be provided in block 27, "ADDITIONAL DATA" of the DD 1348-1.

b. Certification as hazardous will be provided using DD Form 1348-1, a DD Form 2271 (Decontamination Tag), or a local form as authorized by the commanding officer. The certification must provide the following information:

(1) Type of explosive hazard and contamination;

(2) Presence of un-vented cavities; and

(3) Estimated maximum credible NEW.

Hazardous certifications shall include the following statement:

"This certifies that the material potentially presenting an explosive hazard listed has been 100% properly inspected and to the best of my knowledge and belief presents an explosion hazard."

The hazardous certification statement may be modified or augmented as required.

c. Containers of certified material will have permanent marking and labeling, and container seals traceable to the certification document. Traceable seals should follow procedures similar to those for ordnance container traceable seals required by NAVSUP P-807 for ready-for-issue ammunition. Containers of material certified as hazardous must be marked in accordance with MIL-STD-129 (series) for shipment and storage. Large items, such as plant equipment, will have permanent weatherproof tags, or painted or engraved markings traceable to the certification document. Certification documents must accompany MPPEH through final disposition and copies must be retained for a minimum of three years.

8. Reporting MPPEH Incidents.

Explosive incidents involving MPPEH, or unauthorized transfer or release of uncertified MPPEH, or transfer or release of MPPEH that presents an unintentional hazard to a qualified receiver, shall be immediately reported. For Navy incidents, notify NOSSA (N5) at DSN 354-6003 or fax DSN 354-6749 (commercial (301) 744-

xxxx). NOSSA is responsible for reporting to higher authorities as required. For Marine Corps incidents, notify MARCORSYSCOM at DSN 378-3170 or fax DSN 378-3160 (commercial (703) 432-xxxx). Contractors will report such incidents in accordance with DOD 4145.26-M (series) requirements for Mishap Investigation and Reporting. This requirement is in addition to the applicable requirements of reference (b), paragraph 1-5.3 for reporting explosive mishaps and incidents. In addition, incidents shall also be reported to the respective Environmental Office and Explosives Safety Office per reference (d).

9. MPPEH Demilitarization and Turn-in to DRMO.

a. Demilitarization is often a separate requirement from safe certification, and safe certification often precedes demilitarization. Demilitarization emphasizes removing the capability to reuse munitions for their original purpose, and meeting trade security requirements. In some cases, a demilitarization requirement (such as venting or burning) may be part of the safe certification requirement.

b. Compliance with DLA demilitarization requirements for purposes of meeting trade security controls on munitions list items beyond certification of an explosives safety status of safe are not covered by this Plan. Contact NOSSA N5 for assistance in resolving conflicts between Navy and DLA requirements.

c. When using DRMO for disposition of MPPEH, documentation must be provided according to DRMO guidance, in accordance with DOD 4160.21-M (series), DOD 4160.21-M-1 (series), and other DLA guidance. In addition, DRMO has certain citizenship requirements. Certification and/or verification of MPPEH as safe require dual signatures on the transfer document. The first signature (referred to by DRMO as the certifier) may be either DOD or contractor personnel. The second signature (referred to by DRMO as the verifier) must be a DOD personnel and a U.S. citizen. Where a U.S. Government contract requires contractor verification (in addition to certification), this requirement may be waived. However, appropriate DOD quality assurance controls must be established.

d. DRMO uses the following certification statement that may be used in place of the statement presented above in this Plan: "This certifies and verifies that the AEDA residue, Range Residue and/or Explosive Contaminated Property listed has been 100% properly inspected and to the best of our knowledge and belief, is inert and/or free of explosives or related materials."

10. Release of MPPEH.

No MPPEH shall be sold or transferred for the purpose of sale, unless it is certified and verified as having an explosives safety status of safe, or certified as to the explosion hazard the material is known or suspected to present. MPPEH certified as hazardous may only be transferred or released to a qualified receiver as defined above.

11. MPPEH Transportation.

a. Material that has been certified safe (degree of explosion hazard 5X) may be shipped over public transportation routes as inert material. Certification documentation must accompany the shipment. If the shipment contains hazardous materials other than explosives, proper U.S. Department of Transportation (DOT) documents, such as a manifest or bill of lading, must accompany the shipment.

b. MPPEH that has NOT been certified safe, or has been certified hazardous (degree of explosion hazard 1X-3X) shall not be transported or shipped over public transportation routes unless determined safe for transport by personnel qualified in EOD, or personnel who the commanding officer or responsible authority certifies as technically qualified to make such a determination. These personnel will provide a signed "Safe to Ship" certification that must accompany the shipment. Proper DOT documents are also required to accompany the shipment. MPPEH that cannot be shipped in accordance with an existing hazard classification must not be transported over public transportation routes until interim hazard classification is obtained from NOSSA N8.

12. Qualification and Certification for Processing MPPEH.

Processing MPPEH is considered handling or physically interacting with ammunition and explosives until the MPPEH is certified safe. All Navy personnel who are responsible for processing, inspecting, certifying and/or verifying MPPEH as safe, or who are responsible for documenting hazardous material as to the explosion hazard the material is known or suspected to present, must be qualified in accordance with an ammunition and explosives handlers qualification and certification program for those tasks as described in reference (b), paragraph 2-3.2 and reference (c). All contractor personnel who possess, manage, process, or provide disposition of MPPEH must be qualified receivers of MPPEH as defined above. Training to support personnel certification shall be tailored to the specific MPPEH to be processed, inspected, or documented as to the explosive safety status and shall include:

a. Recognition and safe handling of used and unused military munitions of the type to be handled.

b. Demilitarization and trade security controls and procedures for release from DOD control that apply to the type of material to be handled.

c. Management (e.g. marking, segregating, securing), processing, and transportation of MPPEH of the type to be handled.

Note: The training portion of the qualification requirements can be met by a mixture of formal classroom training, computer based training, and on-the-job training.

13. Empty Containers.

All containers previously used for ammunition, weapons, explosives, or other hazardous materials shall be subjected to a 100% inspection prior to shipment to other activities for storage, reuse, or salvage. This inspection is to ensure that there is no material in the containers that could create a hazard during shipment, offloading, storage, and processing for reuse or salvage. Inspections shall both ensure that the containers are empty and determine whether the containers are serviceable and/or economically repairable before shipment. Previous markings from empty containers must be removed per reference (b), paragraph 11-1.5. Empty containers must also be certified safe before release from U.S. Government control, and managed as MPPEH until either empty certification per reference (b), paragraph 11-1.5, or safe certification.

14. Recycling MPPEH in the QRP.

A written explosives Mishap Risk Assessment (MRA) per reference (b), paragraph 7-7.3 or Operational Risk Assessment (ORA) per OPNAVINST 3500.39 (series) will be performed before any QRP may receive MPPEH. The results of the MRA or ORA will be used to develop approved written procedures for processing MPPEH prior to transfer to the QRP. Formal exhaustive, quantitative risk assessments are normally not required for routine processing of material that is eligible for the QRP.

a. The MRA or ORA will identify the nomenclature and description, and the potential explosive hazard associated with the MPPEH. The MRA or ORA will also evaluate the adequacy of the QRP training, oversight, record keeping, processing methods, equipment, and storage facilities. The respective Explosive Safety Office will review the MRA or ORA for approval by the commanding officer.

b. Only the following material is eligible for the QRP: expended small arms ammunition cartridge cases .50 caliber and smaller, and mixed metals gleaned from range clearance, e.g. fragments and shrapnel. Such material is considered most likely to be free of explosive contamination, by its nature, and thus most suitable for turn-in to the QRP following safe certification.

c. Anything requiring demilitarization or that is a Munitions List Item or a Strategic List Item, is not QRP eligible, with the exceptions noted above.

d. All MPPEH, such as expended small arms ammunition cartridge cases and mixed metals gleaned from range clearance, must be certified safe before transfer to the QRP for direct sale or to DRMO for sale to reimburse the QRP.

e. QRP personnel who may receive expended small arms ammunition cartridge cases or mixed metals gleaned from range clearance must be trained at a minimum to do the following: recognize QRP eligible material; verify signatures on all turn-in documents, e.g. DD Form 1348-1, against the current list of personnel authorized to certify as safe; visually inspect certified QRP eligible material and recognize potential explosive safety hazards; and respond properly if an unsafe condition is identified.

f. In addition to the safe certification, the following statement must be included in the documentation associated with the MPPEH.

"Purchasers are cautioned that articles or substances of a dangerous nature may remain in the property regardless of the care exercised to remove same. The U.S. Government assumes no liability for damages to property of the Purchaser or for personal injury, disability or death of the Purchaser, its employees, or to any other person arising from or affiliated with the purchase, use or dispositions of this material. The purchaser shall hold the U.S. Government harmless from any and all such demands, suits, actions, or claims arising from or otherwise relating to the purchase of this material."